

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

Debtor: LTL Management LLC

Applicant: Bates White, LLC

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition  
Date")

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**SECTION 1  
FEE SUMMARY**

☐ Interim Fee Application No. \_\_\_\_\_ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from September 1, 2022 through September 30, 2022 (the "Eleventh Statement Period").

Total Fees – LTL Bankruptcy:	\$934,499.00
Total Fees – Imerys Bankruptcy (50% of total):	+ \$0.00
Total Fees:	\$934,499.00
Total Disbursements:	+ \$0.00
Total Fees Plus Disbursements:	\$934,499.00
Minus 20% Holdback of Fees:	– \$186,899.80
Amount Sought at this Time:	\$747,599.20

	<u>FEES</u>	<u>EXPENSES</u>	<u>TOTAL</u>
Total Previous Fees Requested:	\$2,321,929.00	\$1,749.23	\$2,323,678.23
Total Fees Allowed to Date:	\$1,419,901.75	\$1,749.23	\$1,421,650.98
Total Retainer (If Applicable):	\$0.00	\$0.00	\$0.00
Total Holdback (If Applicable):	\$170,669.90	\$0.00	\$170,669.90
Total Received by Applicant:	\$2,060,463.21	\$1,749.23	\$2,062,212.44

**Summary by timekeeper included in this Fee Application – LTL Bankruptcy**

Name of Professional	Title	Rate	Hours	Fees
Capps, Cory	Partner	\$1,200	9.9	\$11,880.00
Chandler, Kathleen	Partner	\$750	16.6	\$12,450.00
Evans, Andrew	Partner	\$825	39.1	\$32,257.50
Lobel, Scott	Partner	\$750	135.4	\$101,550.00
Mullin, Charles	Partner	\$1,150	43.9	\$50,485.00
Scher, Benjamin	Partner	\$900	7.2	\$6,480.00
Kennedy, Pauline	Principal	\$750	45.0	\$33,750.00
Aharoni, Assaph	Manager	\$600	65.4	\$39,240.00
Peters, Sarah	Manager	\$600	15.1	\$9,060.00
Belley, Philippe	Senior Economist	\$520	112.4	\$58,448.00
Wang, Jinwen	Senior Economist	\$480	81.9	\$39,312.00
Xu, Alicia	Senior Economist	\$545	52.3	\$28,503.50
Odio-Zuniga, Mariana	Economist	\$460	163.5	\$75,210.00
Cumbo, Peter	Senior Consultant	\$460	0.4	\$184.00
Leander, Ellen	Senior Consultant	\$450	1.5	\$675.00
Saleeby, George	Senior Consultant	\$450	64.3	\$28,935.00
Stewart, Samantha	Senior Consultant	\$450	199.3	\$89,685.00
Duncan, Taylor	Senior Research Analyst	\$460	10.5	\$4,830.00
Coleman, Nathan	Consultant II	\$390	171.3	\$66,807.00
Morey, Austin	Consultant II	\$390	175.0	\$68,250.00
Swope, Madison	Consultant II	\$390	169.8	\$66,222.00
Weiss, David	Consultant II	\$390	111.7	\$43,563.00
McBride, Hannah	Consultant	\$365	163.6	\$59,714.00
Krombach, Jennifer Kim	Librarian	\$240	12.2	\$2,928.00
Le Gall, Laure	Research Specialist	\$240	17.0	\$4,080.00
<b>TOTAL</b>			<b>1,884.3</b>	<b>\$934,499.00</b>

**Summary by timekeeper included in this Fee Application – Imerys Bankruptcy**

Name of Professional	Title	Rate	Hours	Fees
N/A			N/A	N/A
<b>TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>
<b>50% OF TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>

## SECTION II SUMMARY OF SERVICES

<b>SERVICES RENDERED – LTL BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
Analysis	766.7	\$426,307.50
Client Communication	22.3	\$16,878.00
Data Gathering & Processing	786.9	\$339,426.00
Fee Request Preparation	9.3	\$5,535.00
Project Management	17.3	\$13,708.00
Report	29.7	\$26,272.50
Research	252.1	\$106,372.00
<b>SERVICE TOTALS</b>	<b>1,884.3</b>	<b>\$934,499.00</b>

<b>SERVICES RENDERED – IMERY'S BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
N/A	N/A	N/A
<b>SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>
<b>50% OF SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENT TYPE – LTL BANKRUTPCY</b>	<b>AMOUNT</b>
N/A	N/A
<b>DISBURSEMENTS TOTAL</b>	<b>\$0.00</b>

<b>DISBURSEMENT TYPE – IMERYS BANKRUTPCY</b>	<b>AMOUNT</b>
N/A	N/A
<b>DISBURSEMENTS TOTAL</b>	<b>\$0.00</b>

**SECTION IV  
CASE HISTORY**

1. Case Filed: October 14, 2021 (the “Petition Date”)
2. Chapter under which case commenced: Chapter 11
3. Date of Retention: February 15, 2022, effective as of the Petition Date [Dkt. 1483] (the “Retention Order”).<sup>1</sup>
4. Summary explaining the nature of the work performed and the results achieved:<sup>2</sup>

During the Eleventh Statement Period, Bates White provided the following services including, but not limited to:

- Reviewing epidemiological literature related to disease incidence.
- Compiling and analyzing data related to talc claims.
- Continuing to develop a framework for analyzing current and future claims.
- Researching and analyzing information on historical talc use.
- Researching and analyzing information related to State AG claims.
- Preparing materials related to estimation-related analyses.
- Preparing the Tenth Monthly Fee Statement for fees incurred in August.

I certify under penalty of perjury that the above is true.

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<sup>1</sup> The Retention Order is attached hereto as Exhibit B.

<sup>2</sup> The invoice detail submitted hereto as Exhibit C includes detailed time entries summarizing the professional services rendered by Bates White, LLC as talc consultants to the Debtor in the LTL Bankruptcy.

Dated: November 15, 2022  
Washington, DC

Respectfully submitted,

/s/ Scott M. Lobel

Scott M. Lobel

BATES WHITE, LLC

2001 K Street NW

North Building, Suite 500

Washington, DC 20006

Telephone: (202) 408-6110

Facsimile: (202) 408-7838

E-mail: [scott.lobel@bateswhite.com](mailto:scott.lobel@bateswhite.com)

TALC CONSULTANTS FOR DEBTOR